

\*KATHERIAN D. ROE  
Federal Defender  
  
\*MANNY ATWAL  
First Assistant Defender  
  
CHAD M. SPAHN  
Senior Investigator

\*MSBA Certified Criminal Law Specialist

OFFICE OF THE  
**FEDERAL DEFENDER**  
District of Minnesota  
107 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
Phone: 612-664-5858  
Fax: 612-664-5850

JAMES BECKER  
ROB MEYERS  
ERIC RIENSCH  
LISA LOPEZ  
\*JEAN BRANDL  
MATTHEW DEATES  
\*AARON MORRISON  
DAN HUDDLESTON  
SIRI CARLSON MCDOWELL  
AMBROISE DECILAP  
KATE ADAMS  
Assistant Defenders

November 16, 2024

***VIA ECF***

The Honorable John R. Tunheim  
United States District Judge  
300 South Fourth Street  
Minneapolis, MN 55415

Re: United States v. Steve Shand  
*Case No.: 22-cr-40*

Dear Judge Tunheim:

Counsel for Steve Shand writes to advise the Court that Yash Patel, who the Government indicated at the pre-trial conference will be called as a witness, should be advised of his rights before he testifies. Mr. Patel is one of the alleged illegal aliens that was detained by the Government on January 19, 2022. A review of the Government's disclosures regarding Mr. Patel reveals that he is not represented by counsel, that he does not have an agreement with the Government in relation to his testimony, and that his testimony under oath will at the minimum expose him to criminal liability for illegal entry and likely adverse immigration consequences. Counsel believes Mr. Patel should be advised of his rights and appointed an attorney prior to his testimony.

Sincerely,

*s/ Aaron Morrison*

Aaron Morrison  
Assistant Federal Defender

AM/sls